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9 Attorneys for Plaintiff
UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 UNITED STATES OF AMERICA,) Case No. 3:09-cr-00350-WHA
15 Plaintiff,)
16 v.) STIPULATION AND
17 ALEXANDER JAMES TRABULSE,) [PROPOSED] ORDER
18 Defendant.)
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21 WHEREAS, the Court conducted a hearing on July 10, 2009;

22 WHEREAS, the government produced approximately 11,351 additional documents to
23 counsel for the defendant and defendant's counsel believes that additional time is necessary to
24 review the evidence and investigate the case, and believes it is in the best interests of the
25 defendant to do so as soon as possible;

26 WHEREAS, a failure to grant the continuance would deny defense counsel the
27 reasonable time necessary for effective preparation, taking into account the exercise of due
28 diligence, and under the circumstances the ends of justice served by a reasonable continuance

STIPULATION AND [PROPOSED] SCHEDULING ORDER
CASE NO. 3:09-cr- 00350-WHA

1 outweigh the best interest of the public and the defendant in a speedy trial;

2 WHEREAS, the defendant consents to a continuation of this case for the above reasons
3 and consents to the exclusion of time from July 10, 2009 until February 8, 2010;

4 THEREFORE, it is hereby stipulated by and between the parties, through their respective
5 counsel of record, that the period of time from July 10, 2009 until February 8, 2010, shall be
6 excluded in computing the time within which the trial of the offense alleged in the Information
7 must commence under Title 18, United States Code, Section 3161.

8 IT IS SO STIPULATED.

9 DATED: July 14, 2009

JOSEPH P. RUSSONIELLO
United States Attorney

10 /s/ A. Reeves

11 Adam A. Reeves
12 Assistant United States Attorney

13 DATED: July 14, 2009

14 THE OFFICE OF THE
15 FEDERAL PUBLIC DEFENDER

16 /s/ L. Stewart

17 Loren G. Stewart
18 Counsel for Defendant
19 ALEXANDER JAMES TRABULSE

1 The Court finds that the ends of justice served by granting a continuance from July 10,
2 2009 to February 8, 2010 outweigh the best interests of the public and the defendant in a speedy
3 trial and in the prompt disposition of criminal cases. The Court therefore concludes that this
4 exclusion of time from July 10, 2009 through and including February 8, 2010 should be made
5 under Title 18, United States Code, Sections 3161(h)(7)(B).

6 IT IS SO ORDERED.

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8 Dated: July 14, 2009

